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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

No. CR 23-216-RGK

14 Plaintiff,

15 v.

16 PHILIP ALAN DRECHSLER,

17 Defendant.
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GOVERNMENT'S UNOPPOSED EX PARTE
APPLICATION FOR MODIFICATION OF
THE BRIEFING SCHEDULE FOR
DEFENDANT'S APPLICATION FOR
REVIEW/RECONSIDERATION OF ORDER
SETTING CONDITIONS OF
RELEASE/DETENTION FOR MOTION;
DECLARATION OF BRUCE K. RIORDAN

21 Respondent United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney Bruce K. Riordan,
24 hereby submits this *unopposed ex parte* application for modification
25 of the briefing schedule in the above captioned case. Defendant's
26 counsel has informed the government that there is no opposition to
27 the relief sought herein.
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1 The ex parte application is based upon the attached Declaration
2 of Bruce K. Riordan, the files and records in this case, and such
3 further evidence and argument as the Court may permit.

4 Dated: February 12, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 MACK E. JENKINS
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/
11 _____
12 BRUCE K. RIORDAN
13 Assistant United States Attorney

14 Attorneys for Plaintiff
15 UNITED STATES OF AMERICA
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DECLARATION OF BRUCE K. RIORDAN

I, BRUCE K. RIORDAN, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the United States of America in this matter.

2. On or about January 22, 2024 defendant Philip Alan Drechsler, by and through his counsel of record, notified the Court that he would seeking review/reconsideration of his detention orders in this matter (the "Application"). (CR Dkt. 61.)

3. On January 25, 2024, the Court set a briefing schedule for the Application as follows: the defense motion due on or before February 2, 2024; the government's opposition due on or before February 12, 2024; and defendants' reply to be filed no later than February 16, 2024. (CR Dkt. 22.)

4. Government's counsel of record has reviewed the defendant's February 2, 2024 filing in support of the Application. (CR Dkt 63.) In light of the filing and the issues raised therein, government counsel contacted counsel for defendant, Deputy Federal Public Defender Kate Morris, seeking an agreed to modification of the briefing schedule as follows: the government's opposition due on or before **February 14, 2024**; and defendants' reply to be filed no later than **February 21, 2024**.

5. Mr. Morris indicated that she has no opposition to the government's application for the modification of the briefing schedule and that the dates were suitable.

6. Accordingly, the government respectfully asks to modify the current briefing deadlines and requests that the Court set the

1 following briefing schedule: the government's response to the
2 Application to be filed with the Court no later than **February 14,**
3 **2024,** and defendant's reply, if any, to be filed no later than
4 **February 21, 2024.**

5 7. This application is not made for any purpose of delay or
6 tactical advantage, but merely to allow counsel adequate time to
7 provide the Court with sufficient briefing to adjudicate the
8 Application.

9 I declare under penalty of perjury that the foregoing is true
10 and correct to the best of my knowledge and belief.
11

12 Date: February 12, 2024

/s/ Bruce K. Riordan

Bruce K. Riordan
Assistant United States Attorney